

International Origination And IP-Relay

WorldCom, Inc

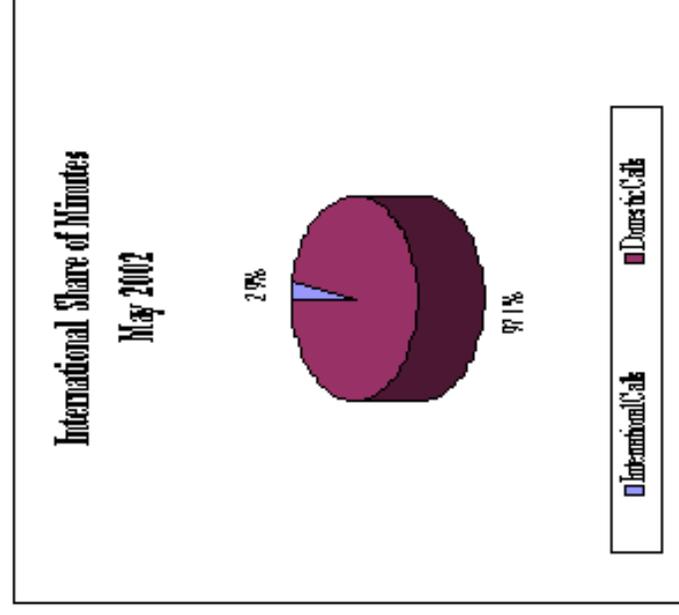
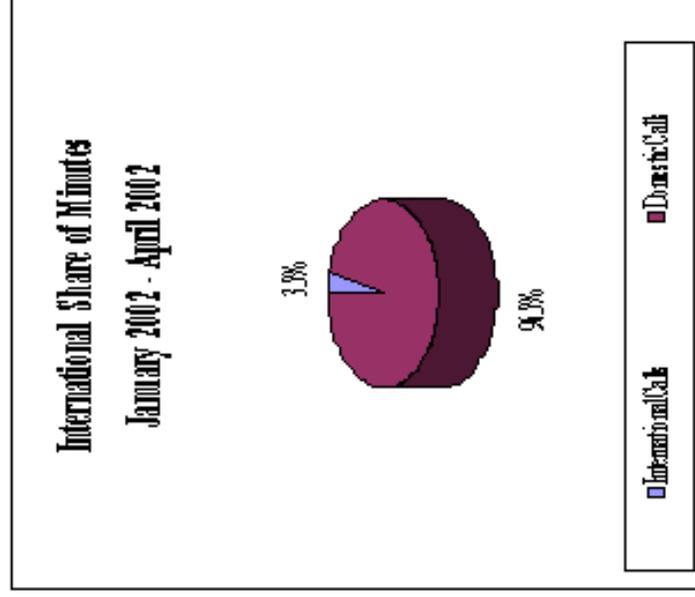
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The Issue: IP-Relay Permits International-to- International Relay Calls

- NECA does not currently reimburse International-to-International calls that are routed through the U.S.
- But Internet protocols do not currently differentiate an International-to-International call from a Domestic-to-International call.

The Scope of the Problem Is Small



Policy Principles to Evaluate Solutions

- Technically feasible
- Administratively feasible
- Effectively addresses fraudulent international calling
- Minimally restricts legitimate international calling

A Technical Solution That Completely Prevents Only Fraudulent Calling Is Not Feasible

- Would require linking an Internet address with a unique geographic location.
- Internet working groups have no plans to link Internet addresses to geographic locations.
- Solution is not in control of any single carrier.
- At this point there is no technical solution.

Domain Name Look-Ups Can Help Identify Internationally Originated Calls

- IP-Relay Internet gateway identifies an internet address
- Performs reverse domain name look-up on that address
 - ✓ If another country is identified, international terminations would be blocked.
 - ✓ Domestic terminations would be permitted.
 - ✓ May not identify the country associated with that Internet address
- Country-specific domain names are increasingly prevalent

Combination of Administrative and Technical Procedures Can Effectively Prevent Internationally Originated Calls

- Users must register and certify that they reside in the U.S. in order to complete an international call.
 - ✓ Commission should weigh privacy with the level of required documentation.
- Domain name lookups will be used.
- Periodic recertification

Commission Has Relied On Similar Administrative Procedures For Other Universal Service Programs

- Various levels of documentation to participate in other universal service programs
 - ✓ Lifeline and Link-Up America
 - ✓ Schools & Libraries
 - ✓ Rural Health Care

Administrative Solution Adheres Well To Policy Principles

- Technically feasible
- Minimal administrative effort for users
- Minimal administrative effort for providers
- Effectively targets eligible users
- Minimal restrictions on legitimate international calling